



R. Taylor Speer

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December 29, 2020

Via electronic filing

Jo Anne Wessinger-Hill, Hearing Officer
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
101 Executive Center Drive
Suite 100
Columbia, SC 29210

Re: Letter of support for motion by Intervenor Vote Solar requesting notice and public hearing

Docket:	2020-229-E
Summary:	Dominion Energy South Carolina, Inc.'s Establishment of a Solar Choice Metering Tariff Pursuant to S.C. Code Ann. Section 58-40-20 (See Docket No. 2019-182-E)
TPGL:	10879616v2 17619.00102

Dear Ms. Wessinger-Hill:

I represent Intervenor Alder Energy Systems, LLC in the above-noted docket. I write on Alder's behalf, for the purpose of supporting Intervenor Vote Solar's recent motion requesting additional notice and public hearing, relative to the net energy metering rates proposed by Dominion Energy South Carolina in the instant docket.

On December 22, 2020, Vote Solar filed a motion (Doc. 296216) requesting that the Commission establish a hearing for public comment on the net energy metering rates proposed by DESC in this proceeding, which was opened to established successor NEM tariffs. Alder agrees additional notice and public comment relative to the proposed riders is necessary and prudent in light of the significant changes proposed by DESC for net metering rates, including: time of use rates, subscription fees and facilities charges.

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Alder previously testified it is a distributed generation developer and contractor based out of Charleston, South Carolina. The company focuses on providing solar solutions for commercial and industrial customers. The rates and riders proposed by DESC in this proceeding substantially alter the terms upon which Alder's customers have previously participated in behind-the-meter, distributed generation. DESC's proposed overhaul of net metering could upend the investments Alder's customers have committed to powering their facilities with distributed generation, potentially leaving these participants with frustrated financial expectations. Corporate electric investments are often made by issuing debt and DESC's proposed riders would require, at minimum, a retooling of those existing and associated amortization schedules.

DESC admits it did not hold a stakeholder process for the NEM rates and riders it proposes in this proceeding. (Kassis Tr. 8:10-11.) Alder believes South Carolina's ratepayers should have formal opportunity to comment on these important matters germane to their electric service and their now legally-protected right to access solar energy. *See* S.C. CODE ANN. §§ 58-41-05 and 58-41-40.

For these reasons, Alder supports the relief requested by Vote Solar in its recent motion.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY P.A.

/s/ R. Taylor Speer

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